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*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

**NOTICE OF TRUSTEE'S APPLICATION FOR AN ORDER TO SHOW CAUSE  
PURSUANT TO LOCAL BANKRUPTCY RULE 9077-1(a)**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Seanna R. Brown, Esq. dated May 2, 2016, Irving H. Picard, as trustee (the "Trustee") for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS"), under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-III ("SIPA"), and the estate of Bernard L. Madoff ("Madoff"), by and through his undersigned counsel, the Trustee will move under Rule 9077-1(a) of the Local Bankruptcy Rules for the Southern District of New

York for orders authorizing the depositions of Annette Bongiorno and Joann Crupi under Rule 30(a)(2)(B) of the Federal Rules of Civil Procedure, made applicable by Rule 7030 of the Federal Rules of Bankruptcy Procedure, before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, at a hearing to be set by the Court.

Date: May 2, 2016  
New York, New York

**BAKER & HOSTETLER LLP**

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